

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**OPAL C. CORRICA,**

*Plaintiff,*

v.

**AMERICAN AIRLINES,**

*Defendant.*

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**CIVIL ACTION NO. 3:20-cv-00679-B**

**DECLARATION OF THEANNA BEZNEY**

I, Theanna Bezney, am over the age of eighteen and competent to testify to the following based on my personal knowledge:

1. I am of sound mind and capable of making this sworn statement. I have personal knowledge of the facts written in this statement, which are true and correct to the best of my knowledge.

2. I graduated from the University of Texas School of Law in 2015 and have been a member of the State Bar of Texas since 2015. I am admitted to practice in all of the federal and state courts in Texas, and the United States Court of Appeals for the Fifth Circuit. I am also admitted to practice in the Federal District Courts of Colorado and New Mexico, respectively.

3. I am an Associate Attorney in Fisher & Phillips's Dallas office and have been with the firm since 2020. Prior to that, I practiced in the Labor & Employment practice groups of both AmLaw 100 and AmLaw 200 law firms in Dallas, Texas.

4. Fisher & Phillips LLP exclusively represents employers in labor and employment matters. The Firm has 36 offices and more than 500 attorneys nationwide. Over the past eight

years, I have defended dozens of employers in employment-related litigation and arbitrations, including actions arising under federal and state discrimination statutes.

5. In this current matter, I conferred with then-opposing counsel and now-*pro-se* Plaintiff regarding the deficiencies in her discovery responses, and researched and drafted the Motion to Compel.

6. My billing rate on this matter from the time this case opened through January 2021 was \$335.00 per hour, after which date my billing rate for this matter increased to \$384.00 per hour.

7. These amounts are reasonable and well-within the market rate for other attorneys of comparable experience appearing before the U.S. District Court for the Northern District of Texas.

8. Specifically, pursuant to the 2021 Attorneys' Fee Hourly Rate Yearbook published by the Texas Employment Lawyers Association,<sup>1</sup> the average billing rate for attorneys appearing before the Northern District of Texas who also graduated in the 2010s is \$422.22 per hour.

9. I spent 3.3 hours, which equates to \$1,218.20 in fees, conferring in writing and by telephone with then-opposing counsel and the *pro se* Plaintiff regarding the discovery deficiency in an effort to secure the discovery without having to move to compel. In connection with Defendant's Motion to Compel, I spent 2.9 hours developing the legal arguments and drafting the Motion to Compel, which equates to fees billed of \$1,113.60. Thus, the total fees from my time on the pre-motion conferring and the motion itself were \$2,331.80.

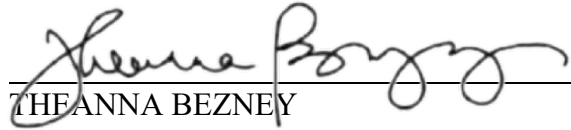
10. Fisher & Phillips LLP has charged Defendant for all of the fees cited above. These fees have been paid or will be paid by Defendant in the regular course of business.

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<sup>1</sup> Attached as Exhibit A to the Declaration of Daniel E. Farrington, attached as Exhibit 1 to the instant motion.

11. As set forth in Defendant's Motion for Attorneys' Fees, the expenses incurred were necessary, reasonable, and customary in order to prosecute this action.

12. None of the fees sought are duplicative of any other attorney's work on this case.

  
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THEANNA BEZNEY